

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

KOSS CORPORATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:20-cv-00665-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF MICHAEL T. PIEJA**

I, Michael Pieja, hereby declare:

1. I am a partner at Goldman Ismail Tomaselli Brennan & Baum LLP. I represent Apple Inc. in this matter. I submit this declaration in support of Defendant Apple Inc.'s Responsive Claim Construction Brief.

2. I am over 18 years of age and competent to make this declaration. If called to testify as a witness in this matter, I could and would testify truthfully to each of the statements in this declaration.

3. Attached as Exhibit A is an excerpted true and correct copy of *Newton's Telecom Dictionary* (27th ed. 2013), Bates-stamped APL-KOSS\_00000804–APL-KOSS\_00000816.

4. Attached as Exhibit B is an excerpted true and correct copy of *Dictionary of Electronics* (4th ed. 2005), Bates-stamped APL-KOSS\_00000829–APL-KOSS\_00000838.

5. Attached as Exhibit C is a true and correct copy of the Declaration of Christopher Hansen, Ph.D. in Support of Apple's Responsive Claim Construction Brief, and Appendices thereto, dated March 12, 2021.

6. Attached as Exhibit D is a true and correct copy of a Google search on the phrase, “passive wireless rechargeable power source,” conducted by me on March 11, 2021.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 12, 2021, in Chicago, Illinois.

/s/ Michael T. Pieja

Michael T. Pieja